

1 **RAMON K. QUICHOCHO, ESQ. (F0243)**  
2 **LAW OFFICES OF RAMON K. QUICHOCHO, LLC**  
3 **2<sup>nd</sup> Floor, Sign Arts Building, San Jose**  
4 **P.O. Box 505621**  
5 **Saipan, MP 96950**  
6 **Tel. No.: 670.234.8946**  
7 **Fax: 670.234.8920**  
8 **Email: karissa129@gmail.com**

9 *Attorney for Defendant Larry B. Hocog*

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN MARIANA ISLANDS**

12 **UNITED STATES OF AMERICA,**

13 **Plaintiff,**

14 **vs.**

15 **LARRY BORJA HOCOG,**

16 **Defendant.**

17 **CRIMINAL CASE NO.: 08-00016-001**

18 **MOTION TO EXTEND TIME TO FILE**  
19 **PRETRIAL MOTIONS**

20 **Hearing:**  
21 **Time:**

22 Defendant Larry Borja Hocog, by and through undersigned counsel, hereby moves this Court  
23 for a seven day extension of time within which to file his pre-trial motions in this case.

24 In support of his motion, Defendant states:

25 1. The Court's May 20, 2008 Order Setting Trial Date set June 3, 2008, as the deadline to  
26 file all pretrial motions.

27 2. On May 20, 2008, Defendant requested production of discovery under the applicable  
28 rules and statutes. A true and correct copy of the May 20, 2008 discovery request letter is attached  
to the Motion to Compel Production of Discovery and marked Exhibit A, and incorporated herein by  
reference.

3. As of the filing of this motion, no such discovery was received by Defendant or his  
counsel.

1 4. Defendant does not anticipate any objection from the government for the granting of this  
2 motion.

3 5. After review of the discovery, Defendant can then decide what pretrial motions to bring.  
4

5 WHEREFORE, for the foregoing reasons, and for any other reasons this Court may deem  
6 just and proper, Defendant, through counsel, respectfully requests that this Motion be granted and  
7 that this Court extend the time for the filing of pre-trial motions.  
8

9 Respectfully submitted this 3rd day of June, 2008.

10 LAW OFFICES OF RAMON K. QUICHOCHO, LLC  
11

12 /s/RAMON K. QUICHOCHO, ESQ.  
13 CNMI Bar No. F0243  
14 Attorney for Defendant  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28